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8	BEFORE THE
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS
10	STATE OF CALIFORNIA
11	In the Matter of the Accusation Against: Case No. 2013-812
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13	CHRISTINE ALANA KNUTSEN 648 Ironwood Street
14	Hemet, CA 92543 ACCUSATION
15	Registered Nurse License No. 735729
16	Respondent.
17	Complainant alleges:
18	<u>PARTIES</u>
19	1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20	official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21	Consumer Affairs.
22	2. On or about August 29, 2008, the Board of Registered Nursing issued Registered
23	Nurse License Number 735729 to Christine Alana Knutsen (Respondent). The Registered Nurse
24	License was in full force and effect at all times relevant to the charges contained herein and
25	expired on March 31, 2012.
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JURISDICTION

- 3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.
- 4. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license.
- 6. Section 2811(b) of the Code provides, in pertinent part, that the Board may renew an expired license at any time within eight years after the expiration.

STATUTORY PROVISIONS

7. Section 2761 of the Code states:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- (a) Unprofessional conduct . . .
- 8. Section 2762 of the Code states:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

- (a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022.
 - (e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible

entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section.

COST RECOVERY

9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

DRUGS

- 10. Dilaudid, a brand name for hydromorphone, is a Schedule II controlled substance as designated by Health and Safety Code Section 11055(b)(1)(J) and is a dangerous drug pursuant to Business and Professions Code section 4022. Dilaudid is a narcotic analgesic prescribed for the relief of moderate to severe pain.
- 11. Morphine/Morphine Sulfate is a Schedule II controlled substance pursuant to Health and Safety Code section 11055(b)(1)(L) and is a dangerous drug pursuant to Business and Professions Code section 4022. Morphine is in a class of drugs called narcotic analgesics and is used to treat pain.
- 12. Norco is a compound consisting of 10 mg. hydrocodone bitartrate, also known as dihydrocodeinone, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(4), and 325 mg. acetaminophen per tablet. Norco is also a dangerous drug pursuant to section 4022.

FACTUAL ALLEGATIONS

- 13. Respondent was employed as a registered nurse at Riverside County Regional Medical Center (RCRMC) in Riverside, California for approximately eight months from June 17, 2010 until March 4, 2011.
- 14. On or about March 1, 2011, the Nurse Manager at RCRMC received a Proactive Diversion Report prepared by the RCRMC pharmacy, which showed that Respondent had the highest score of narcotic utilization among all RCRMC licensed staff within a specific time

frame. After receiving this information, the Nurse Manager conducted an audit of Respondent's Pyxis¹ Narcotic Activity Log and compared it to RCRMC's patients' medication administration records (MAR). The following discrepancies are attributed to Respondent:

15. Patient C:

- a. On February 2, 2011 at 0842 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 5, 2011 at 0833 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- c. On February 5, 2011 at 1303 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

16. Patient D:

a. On February 2, 2011 at 0942 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the

¹ Pyxis is a trade name for the automated singe-unit dose medication dispensing system that records information such as patient name, physician orders, date and time medication was withdrawn, and the name of the licensed individual who withdrew and administered the medication. In the event that only portions of the withdrawn medication is given to the patient, the portions not given to the patient are referred to as wastage. This waste must be witnessed by another authorized user and is also recorded by the Pyxis machine.

patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

- b. On February 2, 2011 at 1147 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- c. On February 2, 2011 at 1338 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- d. On February 2, 2011 at 1608 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- e. On February 2, 2011 at 1806 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- f. On February 4, 2011 at 0750 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

g. On February 5, 2011 at 1605 hours, Respondent removed 5mg/ml of Morphine Sulfate from the Pyxis for this patient. Respondent wasted 2 mg/ml of Morphine Sulfate in the Pyxis machine. Respondent did not document administration of the remaining 3 mg/ml of Morphine Sulfate in the patient's MAR. There is no record of wastage for the remaining 3 mg/ml of Morphine Sulfate withdrawn by Respondent. Therefore, 3 mg/ml of Morphine Sulfate are unaccounted for.

17. Patient E

a. On February 2, 2011, Respondent was not assigned this patient. On February 2, 2011 at 1620 hours, this patient was discharged from RCRMC. On February 2, 2011 at 1818 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.

18. Patient G

a. On February 4, 2011, Respondent was not assigned this patient. On February 4, 2011 at 1110 hours, Respondent removed Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

19. Patient H

- a. On February 4, 2011 at 0828 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 4, 2011 at 1110 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine.

Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

- c. On February 5, 2011 at 0808 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- d. On February 5, 2011 at 1122 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- e. On February 5, 2011 at 1333 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- d. On February 5, 2011 at 1551 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- e. On February 6, 2011, Respondent was not assigned to this patient. On February 6, 2011 at 1900 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of

wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

20. Patient I

a. On February 5, 2011, Respondent was not assigned this patient. On February 5, 2011 at 1220 hours, this patient was discharged from RCRMC. On February 5, 2011 at 1234 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

21. Patient J

a. On February 5, 2011, at 1545 hours, this patient was discharged from RCRMC. On February 5, 2011 at 1556 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.

22. Patient L

- a. On February 6, 2011 at 1020 hours, Respondent removed 2 mg/ml of Morphine Sulfate from the Pyxis for this patient. Respondent did not document administration of the 2 mg/ml of Morphine Sulfate in the patient's MAR. There is no record of wastage for the 2 mg/ml of Morphine Sulfate withdrawn by Respondent. Therefore, 2 mg/ml of Morphine Sulfate are unaccounted for.
- b. On February 6, 2011, at 1230 hours, Respondent removed 1 tablet of Norco from the Pyxis for this patient. Respondent did not document administration of the 1 tablet of Norco in the patient's MAR. There is no record of wastage for the 1 tablet of Norco withdrawn by Respondent. Therefore, 1 tablet of Norco is unaccounted for.
- c. On February 7, 2011, at 0940 hours, Respondent removed 1 tablet of Norco from the Pyxis for this patient. Respondent did not document administration of the 1 tablet of Norco in the

patient's MAR. There is no record of wastage for the 1 tablet of Norco withdrawn by Respondent. Therefore, 1 tablet of Norco is unaccounted for.

23. Patient M

- a. On February 6, 2011 at 1607 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 6, 2011 at 1807 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- c. On February 6, 2011 at 1952 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- d. On February 7, 2011 at 0752 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- e. On February 7, 2011 at 1006 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

- f. On February 7, 2011 at 1156 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- g. On February 7, 2011 at 1413 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- h. On February 7, 2011 at 1602 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- i. On February 11, 2011, Respondent was not assigned to this patient. On February 11, 2011 at 1659 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

24. Patient N

a. On February 7, 2011 at 0747 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

b. On February 7, 2011 at 1547 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

25. Patient O

a. On February 7, 2011, Respondent was not assigned to this patient. On February 7, 2011 at 1743 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .25 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .75 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .75 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .75 mg/ml of Dilaudid is unaccounted for.

26. Patient P

a. On February 11, 2011, at 1640 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.

27. Patient Q

a. On February 10, 2011, Respondent was not assigned to this patient. On February 10, 2011 at 0754 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

28. Patient R

a. On February 10, 2011, Respondent was not assigned to this patient. On February 10, 2011 at 1115 hours, this patient was discharged from RCRMC. On February 10, 2011 at 1150 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent

wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

29. Patient S

a. On February 9, 2011, this patient was discharged from RCRMC. On February 10, 2011 at 1544 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

30. Patient T

- a. On February 11, 2011 at 0751 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- b. On February 11, 2011 at 1049 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- c. On February 11, 2011 at 1639 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

31. Patient U

a. On February 11, 2011, Respondent was not assigned to this patient. On February 11, 2011 at 1521 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

32. Patient W

a. On February 15, 2011, at 0952 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

33. Patient X

a. On February 15, 2011, at 1511 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

34. Patient Y

a. On February 16, 2011, Respondent was not assigned to this patient. On February 16, 2011 at 1330 hours, this patient was discharged from RCRMC. On February 16, 2011 at 1432 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

35. Patient AA

- a. On February 18, 2011, at 0804 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 18, 2011, at 1004 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- c. On February 18, 2011 at 1212 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- d. On February 18, 2011, at 1635 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- e. On February 18, 2011 at 1826 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- f. On February 18, 2011 at 1856 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .25 mg/ml of Dilaudid in the Pyxis machine.

Respondent did not document administration of the remaining .75 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .75 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .75 mg/ml of Dilaudid is unaccounted for.

- g. On February 19, 2011 at 0812 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- h. On February 19, 2011, at 1048 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- i. On February 19, 2011 at 1258 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- j. On February 19, 2011 at 1429 hours, Respondent removed 30 mgs of Morphine Sulfate SR from the Pyxis for this patient. Respondent did not document administration of the 30 mgs of Morphine Sulfate SR in the patient's MAR. There is no record of wastage for the 30 mgs of Morphine Sulfate SR withdrawn by Respondent. Therefore, 30 mgs of Morphine Sulfate SR are unaccounted for.
- k. On February 19, 2011 at 1548 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

- 1. On February 19, 2011 at 1848 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- m. On February 20, 2011 at 0749 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- n. On February 20, 2011 at 1014 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- o. On February 20, 2011 at 1320 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- p. On February 20, 2011 at 1829 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- q. On February 21, 2011 at 0808 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the

patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

- r. On February 21, 2011 at 1240 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- s. On February 21, 2011 at 1007 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- t. On February 21, 2011 at 1744 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

36. Patient BB

- a. On February 18, 2011, at 0851 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 18, 2011, at 1005 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

- c. On February 18, 2011, at 1106 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.
- d. On February 18, 2011, at 1435 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

37. Patient DD

a. On February 18, 2011, Respondent was not assigned to this patient. On February 18, 2011 at 1900 hours, this patient was discharged. On February 18, 2011 at 1904 hours (after the patient was discharged), Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient.

38. Patient EE

- a. On February 20, 2011, at 1013 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- b. On February 20, 2011, at 1230 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- c. On February 20, 2011, at 1559 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

- d. On February 21, 2011, at 1040 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- e. On February 21, 2011, at 0801 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- f. On February 21, 2011, at 1250 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- g. On February 21, 2011, at 1503 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.
- h. On February 21, 2011, at 1559 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent did not document administration of the 1 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the 1 mg/ml of Dilaudid withdrawn by Respondent. Therefore, 1 mg/ml of Dilaudid is unaccounted for.

39. Patient FF

a. On February 20, 2011, Respondent was not assigned to this patient. On February 20, 2011 at 1305 hours, this patient was discharged from RCRMC. On February 20, 2011 at 1331 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

40. Patient GG

- a. On February 20, 2011 at 1001 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- b. On February 21, 2011 at 1229 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

41. Patient HH

- a. On February 20, 2011, at 1454 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.
- b. On February 20, 2011, at 1802 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.

42. Patient JJ

- a. On February 24, 2011, at 0919 hours, Respondent removed 2 mg/ml of Morphine from the Pyxis for this patient. Respondent did not document administration of the 2 mg/ml of Morphine in the patient's MAR. There is no record of wastage for the 2 mg/ml of Morphine withdrawn by Respondent. Therefore, 2 mg/ml of Morphine are unaccounted for.
- b. On February 24, 2011, at 1229 hours, Respondent removed 2 mg/ml of Morphine from the Pyxis for this patient. Respondent did not document administration of the 2 mg/ml of

Morphine in the patient's MAR. There is no record of wastage for the 2 mg/ml of Morphine withdrawn by Respondent. Therefore, 2 mg/ml of Morphine are unaccounted for.

c. On February 24, 2011, at 1800 hours, this patient was discharged from RCRMC. On February 24, 2011 at 1804 hours, Respondent removed 2 tablets of Norco from the Pyxis for this patient. Respondent did not document administration of the 2 tablets of Norco in the patient's MAR. There is no record of wastage for the 2 tablets of Norco withdrawn by Respondent. Therefore, 2 tablets of Norco are unaccounted for.

43. Patient KK

a. On February 24, 2011, Respondent was not assigned to this patient. On February 24, 2011 at 1530 hours, this patient was discharged from RCRMC. On February 24, 2011 at 1611 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.

44. Patient LL

- a. On February 24, 2011 at 0809 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- b. On February 25, 2011 at 1250 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.
- c. On February 25, 2011 at 1648 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .75 mg/ml of Dilaudid in the Pyxis machine.

Respondent did not document administration of the remaining .25 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .25 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .25 mg/ml of Dilaudid is unaccounted for.

45. Patient MM

a. On February 25, 2011, at 1245 hours, this patient was discharged from RCRMC. On February 25, 2011 at 1251 hours, Respondent removed 1 tablet of Norco from the Pyxis for this patient. Respondent did not document administration of the 1 tablet of Norco in the patient's MAR. There is no record of wastage for the 1 tablet of Norco withdrawn by Respondent. Therefore, 1 tablet of Norco is unaccounted for.

46. Patient NN

- a. On February 25, 2011 at 1608 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- b. On February 25, 2011 at 1759 hours, Respondent removed 1 mg/ml of Dilaudid from the Pyxis for this patient. Respondent wasted .5 mg/ml of Dilaudid in the Pyxis machine. Respondent did not document administration of the remaining .5 mg/ml of Dilaudid in the patient's MAR. There is no record of wastage for the remaining .5 mg/ml of Dilaudid withdrawn by Respondent. Therefore, .5 mg/ml of Dilaudid is unaccounted for.
- 47. On many other occasions, Respondent administered medication to patients who reported that they were not experiencing pain, even though the doctors' orders stated that the drugs should be given to the patient as needed for "severe pain." Respondent also did not administer drugs according to the pain scale or medication order as required on several occasions.

FIRST CAUSE FOR DISCIPLINE

(Unlawfully Obtain Controlled Substances)

48. Respondent is subject to disciplinary action for unprofessional conduct under section 2762(a) in that while employed as a registered nurse at RCRMC, Respondent unlawfully obtained

and possessed controlled substances, as is more particularly set forth in paragraphs 13 through 47 above, which are incorporated herein as though set forth in full.

SECOND CAUSE FOR DISCIPLINE

(Falsify or Make Grossly Incorrect or Inconsistent Entries)

49. Respondent is subject to disciplinary action for unprofessional conduct under Code section 2762(e) for falsifying or making grossly incorrect, inconsistent and/or unintelligible entries in the hospital records of RCRMC by withdrawing medication, charging the withdrawal to patients who did not receive the drugs or for whom Respondent did not document administration or wastage of the drug as is more particularly set forth in paragraphs 13 through 47 above, which are incorporated herein as though set forth in full.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

50. Respondent is subject to disciplinary action under section 2761(a) of the Code in that Respondent exhibited general unprofessional conduct, as set forth in paragraphs 13 through 47, above, which are incorporated herein as though set forth in full.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- Revoking or suspending Registered Nurse License Number 735729, issued to Christine Alana Knutsen;
- 2. Ordering Christine Alana Knutsen to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

1	3. Taking such other and further action as deemed necessary and proper.
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4	DATED: March 20, 2013 Stave Bern
5	LOUISE R. BAILEY, M.ED., RN Executive Officer
6	Board of Registered Nursing
7	Department of Consumer Affairs State of California Complainant
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Accusation